

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

LORD ABBETT INVESTMENT TRUST –  
LORD ABBETT SHORT DURATION  
INCOME FUND, et al.,

Plaintiffs,

v.

VALEANT PHARMACEUTICALS  
INTERNATIONAL, INC., et al.,

Defendants.

Civil Action No. 17-6365(MAS)(LHG)

**STIPULATION AND [PROPOSED] ORDER**

WHEREAS, Plaintiffs in the above-captioned actions have filed a Complaint against Valeant Pharmaceuticals International, Inc., J. Michael Pearson, Howard B. Schiller, Robert L. Rosiello, Tanya Carro, and PricewaterhouseCoopers LLP (together, “Defendants,” and together with Plaintiffs, the “Parties”);

WHEREAS, counsel for Defendants have agreed to accept service of the Complaint;

WHEREAS, counsel for Plaintiffs and Defendants have conferred and agreed to extend the time to respond to the Complaint, and agreed to a briefing schedule for any motion(s) to dismiss that Defendants may file as their response to the Complaint;

IT IS HEREBY STIPULATED AND AGREED, by the undersigned counsel on behalf of the Parties, as follows:

(a) All Defendants will have until October 23, 2017 to answer, move to dismiss, or otherwise respond to the Complaint;

(b) In the event any of the Defendants move to dismiss the Complaint, Plaintiffs will then have until December 22, 2017 to oppose any such motion to dismiss, and the Defendants will then have until January 29, 2018 to file any replies in support of their motions to dismiss.

Stipulated and agreed to by:

DATED: September 12, 2017

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